UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TENNESSEE
NORTHERN DIVISION

IN RE:

REGAL PETROLEUM COMPANY, INC. No. 3:16-bk-33660-SHB
CHAPTER 11

Debtor.

EMERGENCY MOTION OF DEBTOR FOR AUTHORITY TO PAY PREPETITION WAGES

NOTICE OF EMERGENCY HEARING

Notice is hereby given that:

A hearing will be held on this matter on the **14th day of December, 2016 at 10:00 a.m.,** in Courtroom 1-C, located at the Howard H. Baker, Jr. U.S. Courthouse, 800 Market Street, Knoxville, TN 37902.

If you do not want the court to grant the relief requested, you or your attorney must attend this hearing. If you do not attend the hearing, the court may decide that you do not oppose the relief sought in the application and may enter an order granting that relief.

Debtor Regal Petroleum Company, Inc. (the “Debtor”), by and through counsel, pursuant to 11 U.S.C. § 105(a) and 11 U.S.C. § 507(a)(4), moves this Honorable Court for authority to pay certain prepetition wages of employees. For cause, the Debtor represents the following:

1. The Debtor filed a voluntary petition under Chapter 11 of the Bankruptcy Code on December 12, 2016 (the “Petition Date”).

2. The Debtor is operating its business as debtor-in-possession and plans to continue to operate its business.

3. On the Petition Date, the Debtor had 35 employees.

4. The Debtor's employees are paid in arrears. Payroll for the one-week period ending December 9, 2016 is due on December 16, 2016.

5. The total payroll due on December 16, 2016 for prepetition services is $29,175.40. Attached hereto as *Exhibit 1* is an itemization of the payroll due.

6. If the Debtor does not make payroll, it anticipates that it will lose some or all of its employees and would therefore be unable to keep operating.

7. The unpaid prepetition wages are priority claims under 11 U.S.C. § 507(a)(4). None of the employees have claims exceeding $10,000.00. The employees are entitled to a lien pursuant to Tenn. Code Ann. § 66-13-101.

WHEREFORE, the Debtor requests entry of an order authorizing the Debtor to pay the above-described prepetition wages, including payroll taxes and other deductions, for the period ending December 9, 2016.

RESPECTFULLY SUBMITTED this 13th day of December, 2016.

/s/Keith L. Edmiston
Keith L. Edmiston, BPR 018366
EDMISTON FOSTER
P. O. Box 30782
Knoxville, TN 37930
(865) 248-6038

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Motion has been served on the attorney for the U.S. Trustee, the Assistant U.S. Attorney for the Eastern District of Tennessee, the Internal Revenue Service, all parties requesting notice, all secured creditors, and all other creditors, all as identified below and in the manner indicated below, electronically via ECF or by first-class mail, properly addressed and proper postage prepaid, on this the 13th day of December, 2016:

/s/Keith L. Edmiston

U.S. Trustee
800 Market Street, Ste. 114
Knoxville, TN 37902
[ECF]

Internal Revenue Service
Centralized Insolvency Operations
PO Box 7346
Philadelphia, PA 19101-7346
[Fax and USM]

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Knox County Trustee
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City of Knoxville
Revenue Enforcement
P. O. Box 1028
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Internal Revenue Service
IRS Insolvency
801 Broadway
Nashville, TN 37203
[Fax and USM]

Kentucky Department of Revenue
501 High Street
Frankfort, KY 40601
[Fax and USM]

Peoples Bank of the South
106 W. Central Ave.
LaFollette, TN 37766
[Fax and USM]

Vinland Energy
2704 Old Rosebud Road
Ste. 320
Lexington, KY 40509
[Fax and USM]

Merchant Cash & Capital
460 Park Ave. 10Fl
New York, NY 10016
[E-Mail and USM]

Heil Trailer 3808 Bells Lane Louisville, KY 40211 [Fax and USM]	Palmer Leasing 2575 Tobey Dr. Indianapolis, IN 46219 [Fax and USM]
Post Trailer Repairs 1905 Sutherland Ave. Knoxville, TN 37921 [Fax and USM]	Webb Trailer P.O. Box 907 Catlettsburg, KY 41129 [Fax and USM]
Worldwide Equipment 107 WE Dr. Prestonsburg, KY 41653 [Fax and USM]	First Volunteer Bank 728 Broad St. Chattanooga, TN 37402 [Fax and USM]
Fleet Pride 4539 Rutledge Pike Knoxville, TN 37914 [Fax and USM]	